

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED


2016 APR 14 PM 1:11

HANI KHALIFA,  
Plaintiff,

Docket No.

V.

ALAIN LESSARD and  
STRATO TRANSPORT, Inc.  
Defendants.

BY   
DEPUTY CLERK

1:16-cv-97

**COMPLAINT AND JURY TRIAL DEMAND**

**PARTIES**

1. Plaintiff, Hani Khalifa is a citizen of the United States who currently resides in Canada.
2. Defendant Alain Lessard is a Canadian citizen who resides in E. Broughton, Quebec.
3. Defendant Strato Transport, Inc. is a corporation with its headquarters in Broughton, Quebec.

**JURISDICTION AND VENUE**

4. The amount in controversy exceeds \$75,000, exclusive of interest and costs.
5. This Court has diversity jurisdiction pursuant to 28 U.S.C. § 1332(a).
6. Venue is proper pursuant to 28 U.S.C. § 1391(a)(2), since the events giving rise to Plaintiff's claim occurred in the District of Vermont.

**FACTS**

7. On March 13, 2014, Plaintiff was operating his vehicle on Interstate 89 south in Georgia, Vermont.
8. Defendant Lessard, who was operating a tractor trailer owned by Defendant Strato Transport, Inc., lost control of his vehicle while trying to slow down on the ice and snow-covered highway.
9. Moments after the tractor trailer jack-knifed, the truck slammed into Plaintiff's vehicle.

JARVIS, McARTHUR  
& WILLIAMS  
ATTORNEYS AT LAW  
SUITE 2E - PARK PLAZA  
95 ST. PAUL STREET  
P. O. BOX 902  
BURLINGTON, VT  
05402-0902  
802-658-9411

10. The collision between the two vehicles was caused by Defendant Lessard's negligent failure to maintain control of his vehicle.

11. As Defendant Lessard's employer, Defendant Strato Transport, Inc. is vicariously liable for Lessard's negligence.

12. As a result of the collision, Plaintiff suffered bodily injuries for which he has sought medical treatment.

13. To date, Plaintiff has incurred approximately \$46,154.00 in medical expenses, which he claims as special damages.

WHEREFORE, Plaintiff seeks compensation for any and all damages he incurred as a result of Defendants' negligence including, but not limited to, lost income, bodily injury, pain and suffering, loss of enjoyment of life, both temporary and permanent, and medical expenses.

Plaintiff hereby demands a trial by jury.

DATED at Burlington, Vermont this 14<sup>th</sup> day of April, 2016.

Respectfully submitted,

By: 

David J. Williams, Esq.  
Jarvis, McArthur & Williams  
P.O. Box 902  
Burlington, VT 05402  
[dwilliams@jarvismcarthur.com](mailto:dwilliams@jarvismcarthur.com)

By: 

Brooks G. McArthur, Esq.  
Jarvis, McArthur & Williams  
P.O. Box 902  
Burlington, VT 05402  
[bmcarthur@jarvismcarthur.com](mailto:bmcarthur@jarvismcarthur.com)

JARVIS, MCARTHUR  
& WILLIAMS  
ATTORNEYS AT LAW  
SUITE 2E - PARK PLAZA  
95 ST. PAUL STREET  
P. O. BOX 902  
BURLINGTON, VT  
05402-0902  
802-658-9411